

UNITED STATES DISTRICT COURT

for the
District of Minnesota

Division

RECEIVED
BY MAIL

NOV 19 2020

CLERK, U.S. DISTRICT COURT
ST. PAUL, MN

Gary L. Coson

Case No.

20-cv-2359 NEB/LIB

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

The Minnesota Secretary of State
The State of Minnesota

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION

SCANNED

NOV 19 2020

U.S. DISTRICT COURT ST. PAUL

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Gary L. Coson
Street Address	1231 Madison Avenue #316
City and County	Detroit Lakes, Becker
State and Zip Code	Minnesota 56501-4141
Telephone Number	(415) 233-3682
E-mail Address	constitutionman1@outlook.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Minnesota Secretary of State
Job or Title <i>(if known)</i>	Bibi Black, General Counsel
Street Address	100 Rev Dr Martin Luther King Jr Boulevard, Ste. 180
City and County	St. Paul, Ramsey
State and Zip Code	MN 55155
Telephone Number	(651) 201-1326
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	State of Minnesota
Job or Title <i>(if known)</i>	Keith Ellison, MN Attorney General
Street Address	445 Minnesota Street, Ste.1400
City and County	St. Paul, Ramsey
State and Zip Code	MN 55101
Telephone Number	(800) 657-3787
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

United States Constitution Article 1 Section 2[1]

The perpetuating of violations of the Civil Rights Act Title 18 USC 245b(2)(A)

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Gary L. Coson, is a citizen of the
State of *(name)* Minnesota.

b. If the plaintiff is a corporation

The plaintiff, *(name)*, is incorporated
under the laws of the State of *(name)*,
and has its principal place of business in the State of *(name)*.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* State of Minnesota/Secretary of State, is a citizen of
the State of *(name)* Minnesota. Or is a citizen of
(foreign nation).

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
In the State of Minnesota

- B. What date and approximate time did the events giving rise to your claim(s) occur?
November 3, 2020
- _____

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*
 The defendants are in the process of violating the United States Constitution and the Constitutional definition of the word "People" by making a false certification of the Elections thereby causing candidates to commit a felony by taking the Oath of Office (Title 18 USC 912: False Personation) and the Secretary of State committing a felony by making that false certification (Title 18 USC 2: Aiding).
-

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.
 No money is involved with this case but our Constitutional Rights are at risk of being lost if the Democracy Constitution, that is made and not written, is allowed to go forward that throws away your Constitutional Rights because you do not have "the rights you think the founding fathers gave you" (Rev. Ludder, Political Science Instructor, Santa Rosa Junior College, Santa Rosa, CA(1997)).

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.
 Declare the election null and void in the United States until an election can be had that complies with the United States Constitution under Article 1 Section 2[1] and the Constitutional definition of the word "People" in that section for United States Senator and House of Representatives.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/14/2020

Signature of Plaintiff



Printed Name of Plaintiff

Gary L. Coson

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address